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Sent: Thu, 1 Nov 2012 15:15:49 -0400 (EDT)
To: "Glover, Sherrice" <SGlover@amerisourcebergen.com>
Subject: PP presentation
Attachments: Board Presentation110112.pptx

Chris' board presentation.

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PRESCRIPTION DRUG DIVERSION

Prescription Drug Diversion

- Prescription painkillers now cause more drug overdose deaths than cocaine and heroin, combined.
- Prescription painkillers are now the leading cause of accidental deaths in the United States, accounting for more deaths than automobile accidents.
- Increased DEA scrutiny of pharmaceutical supply chain
 - - DEA suspends Cardinal Health's Lakeland facility's license.
 - - DEA shuts down shipments from Walgreen facility.
 - - DEA revokes Two CVS registrations to sell controlled substances.
 - - DEA focus now shifting to generic manufacturers., i.e., Covidien,
 - Actavis/Watson, etc.
- Diversion  ***Enforcement.***

PRESCRIPTION DRUG DIVERSION

Title 21 - Code of Federal Regulations

- **21 CFR 1301.74 (a)** requires wholesale distributors to verify that customers are licensed to possess controlled substances.
- **21 CFR 1301.74 (b)** requires that registrants design and operate systems to identify suspicious orders and report suspicious orders to DEA when discovered.
- **21 CFR 1301.71(a)** – “All applicants and registrants shall provide **effective controls** and **procedures** to guard against theft and diversion of controlled substances.”

PRESCRIPTION DRUG DIVERSION

Diversion Control Program

- New Customer Due Diligence.
- Order Monitoring and Suspicious Order Reporting.
 - Statistical analysis to identify trends
 - On site pharmacy inspections.
 - Daily reporting to the DEA
- Investigation.
- Collaborative efforts including education and training with:
 - Industry groups
 - Manufacturers
 - Customer groups
 - ABC associates

PRESCRIPTION DRUG DIVERSION



- ABC lowest unit of sale – bottle of 100 tabs
- ABC cost \$0.48 (per tab) x 100 = \$4.80
- Street Price \$30.00 (per mg) x 100 = \$3,000.00

